

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)	
)	
Plaintiff)	
v.)	Case No. PJM 08 cv 0921
)	
WORLD AVENUE USA, LLC, et al.)	
Defendants)	
)	

**WORLD AVENUE USA, LLC'S MOTION FOR LEAVE
TO TAKE LIMITED EXPEDITED DISCOVERY FROM PLAINTIFF**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant, WORLD AVENUE USA, LLC (“WAUSA”), through the undersigned counsel, respectfully moves the Court to seek Leave to Take Limited Expedited Discovery from the Plaintiff, Beyond Systems Inc. (“BSI”).

WAUSA seeks discovery consisting of eleven (11) narrow categories of documents relevant to its Motion to Dismiss for Fraud on the Court and its Memorandum of Points and Authorities in Support of the Motion. *See* DE 323, 323-1. The Request for Production is limited in scope, specific and narrowly tailored to BSI’s fraud on the Court. *See* Exhibit 1 to Memorandum of Points and Authorities in Support of this Motion. Further, there is an immediate need to quickly address the harm done to WAUSA by BSI’s use of legal process to falsely tell third parties that WAUSA was under a nonexistent Federal criminal investigation and its subsequent efforts to conceal its actions. Finally, there is no undue burden on BSI to comply with the limited document requests as all of the potentially responsive documents are of recent vintage and do not require substantial effort to produce.

Accordingly, WAUSA meets the reasonableness and good cause standard for expedited discovery recognized in the Fourth Circuit, and its Motion should be granted.

Additional facts and authorities supporting WAUSA's Motion are set forth in its Memorandum of Points and Authorities which is filed herewith and incorporated herein by reference.

WHEREFORE, Defendant WORLD AVENUE USA, LLC respectfully requests entry of an Order granting its Motion For Leave to Take Limited Expedited Discovery, requiring the service by electronic mail, facsimile, or hand-delivery of a Response to the Request for Production and responsive documents within seven (7) days of the entry of the Court's Order, followed by the production of a Privilege Log within ten (10) days of the entry of the Court's Order, and for such further relief as this Court deems just and appropriate.

DATED: July 16, 2010

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/

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